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8 UNITED STATES DISTRICT COURT

9 SOUTHERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,

11 ) Case No. 07CR2916-JAH

12 Plaintiff,

13 ) ) NOTICE OF MOTION AND

14 vs.

15 ) ) MOTION TO:

16 RAMON MACIAS-COLMENARES (1),  
DEBRA MIKA (2),  
BEATRICE ARANA (3).

17 ) ) 1) COMPEL FURTHER DISCOVERY; AND  
Defendants. ) ) 2) LEAVE TO FILE FURTHER MOTIONS

18 ) ) ) DATE: November 19, 2007

19 ) ) ) TIME: 8:30 a.m.

20 TO: KAREN P. HEWITT, UNITED STATES ATTORNEY :

21 **NOTICE OF MOTION**

22 **PLEASE TAKE NOTICE** that on **November 19, 2007 at 8:30 a.m.** or as soon  
23 thereafter as Counsel may be heard, the Defendant, Beatrice Arana, by and through her counsel,  
24 Donald A. Nunn, will ask this Court to enter an order granting the motions listed below.

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## MOTION

Beatrice Arana, the Defendant in this case, by and through her attorney, Donald A. Nunn, pursuant to the Fourth, Fifth and Sixth Amendments to the United States Constitution, Fed. R. Crim. P. 12, 16 and 26, and all other applicable statutes, case law and local rules, hereby moves this Court for an order to:

- 1) Compel Discovery; and
- 2) Leave to file further motions.

This motion is based upon the instant motion and notice of motion, the attached statement of facts and memorandum of points and authorities, and any and all other matters that may come to this Court's attention prior to or at the time of the hearing on this motion.

Date: October 31, 2007

Respectfully submitted,

s/Donald A. Nunn  
Donald A. Nunn,  
Attorney for Defendant Beatrice Arana

1 CERTIFICATE OF SERVICE  
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3 I, Donald A. Nunn declare that:  
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5 I am, and was at the time of service of the papers herein referred to, over the age of 18  
6 years and not a party to this action; and I am employed in the County of San Diego, California.  
7 My business address is 13426 Community Road. Poway, California.

8 I caused to be served by electronic mail on October 31, 2007  
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10 NOTICE OF MOTION AND MOTION TO COMPEL FURTHER  
11 DISCOVERY AND FOR LEAVE TO FILE FURTHER MOTIONS  
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13 to the following:  
14

- 15 • **Frederick Matthew Carroll**  
16 frederickcarroll@hotmail.com,bratty\_77@yahoo.com
- 17 • **Scott Pactor**  
18 scottpactor@yahoo.com
- 19 • **U S Attorney CR**  
20 Efile.dkt.gc2@usdoj.gov

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s/Donald A. Nunn  
Donald A. Nunn,  
Attorney for Defendant Beatrice Arana